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BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

NOTICE AND ORDER PROVIDING AN  
OPPORTUNITY TO COMMENT ON THE  
SERVICE PERFORMANCE DASHBOARD

Docket No. PI2022-2

**COMMENTS OF THE  
NATIONAL ASSOCIATION OF PRESORT MAILERS**  
(March 18, 2022)

The National Association of Presort Mailers (“NAPM”) respectfully submits these comments on the Postal Regulatory Commission’s Order 6104 in Docket No. PI2022-22 concerning the PRC Service Performance Dashboard and general questions on data accessibility, usability and transparency.

**About NAPM.** NAPM membership includes 87 company members representing 113 mailing sites producing mailings in 40 states. NAPM represents mail owners preparing their own mail, mail service providers (MSPs) that presort and commingle customer mailings, mail service providers that perform printing services, and vendor solutions providers to the mailing industry. Our MSP members interact with, and collect mail from, tens of thousands of business mail consumers, providing them with access to affordable postage prices, excellent customer service, and adding value to their mail by presorting, commingling, barcoding and more so that the client can receive the benefits of postage discounts and service improvement with minimal involvement with the comprehensive mailing requirements for postal customers wanting to mail at commercial rates.

NAPM’s members add value to mail and parcels through the services they provide to business mailers. Often those services include tracking and monitoring

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USPS service performance and acting as liaison with the USPS to investigate service issues on behalf of their customers. Our members are committed to ensuring mail remains a successful communications option and in the Postal system – service performance is a big part of that equation, particularly for customers that have other communications options.

## **I. PRC Service Performance Dashboard**

NAPM commends the PRC's efforts to promote transparency by making data more accessible and usable. One of the best things the PRC Beta service performance dashboard does is to show performance and trends at the “product component” level, which not all of the other publicly available tools (referred to below) offer. Because so much performance data gets reported by the USPS and others at a high level (aggregated), it does not reflect the service performance experience of users of a particular product. For example, the performance of First-Class Mail flats is always slower than that of First-Class Mail letters, but performance data largely is aggregated and reported for the combined category. Performance for categories like Bound Printed Matter (BPM) Flats, which continues to experience inferior performance, is not seen when the data is aggregated for all Market Dominant products or broader categories. NAPM believes it is essential for service performance to be reported with as much detail as possible, particularly in terms of the product level, so that performance problems are identified and visible to users.

There are a host of publicly available “tools” that already exist or are being developed to provide access to service performance information, including:

- USPS Historic Mail Trends  
(<https://about.usps.com/what/performance/service->

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[performance/historical\\_trends/index.html](https://www.usps.gov/performance/historical_trends/index.html))

- OIG Service Performance Dashboard (<https://www.uspsoig.gov/service-performance>)
- USPS Quarterly Service Performance Reports (<https://about.usps.com/what/performance/service-performance/>)
- PRC Quarterly USPS Service Performance Reports (<https://www.prc.gov/dockets/quarterly-performance>)
- USPS IMb Planning Tool (<https://iv.usps.com/imb-planning-tool/>)

With the exception of the USPS IMb Planning Tool, all of the above tools are presenting the same quarterly data output from the USPS service performance measurement system. Yet each of the above 4 tools has different features and presents the data in different formats. While the general public likely is not aware of all four tools, they are all publicly available. Because each shows the data in a different manner, that could lead to confusion on the part of the user, and it is imperative that there be consistency in how the data is interpreted (particularly since it is the same data) otherwise the outcome will be confused and frustrated users. Since it is unlikely that any of the bodies that have developed these systems are interested in duplicating someone else's system, at minimum it would be helpful for each to describe exactly what it is presenting and how to interpret it, which would make it easier for users to understand any differences they may perceive in the data between one system and another.

In addition to the above existing tools, if the Postal Service Reform Act is signed into law, the USPS in consultation with the PRC will be developing a new public dashboard for service performance data. If there is a possibility that it would include similar data to what the PRC envisions for its service performance dashboard, it may be better to put efforts into the development of the new legislatively required dashboard and have that include the data the public should have access to rather than the PRC

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expending additional resources to develop a separate dashboard.

In terms of the PRC's beta service performance dashboard – and this applies to other service performance data tools being provided by the USPS and the Office of Inspector General – if these tools are designed to be used by the general public who are typically less educated on postal terms and definitions, there needs to be more explanations included so the user understands what is being presented and how to interpret the data. At the most basic level, that includes a simple definition of what each product category or even mail class includes (e.g., not everyone knows what each mail class includes, much less the product categories), as well as what time periods are being shown (e.g., date range for the FY or quarterly period). While some of this information appears to be found in the “Home” section of the PRC beta dashboard, it would be helpful to either use hyperlinks to the applicable definitions when used in each section of the dashboard or some other technique to make it more user-friendly.

There also needs to be more explanation of what data is being presented, e.g., that not all mail is included in the measurement data, etc. An explanation of how data is being aggregated (where aggregated data is presented) and what that means would also be appropriate. We often have NAPM member customers that see high level aggregated service performance data, for example, that question our members as to why their specific service experience is so different. It is certain that a member of the general public would ask the same question if they are trying to reconcile the service they are experiencing with what is being reported on the PRC dashboard. It would be useful for the general consumer if there were some discussion of how they might use the dashboard, for what purpose, and an overview of what the data means. Perhaps the PRC could conduct a focus group with consumers to get their feedback on what data

they would find of value and other aspects of the dashboard they would find useful, particularly if the general consumer is who this is being designed for.

Some additional comments/recommendations we would offer on the PRC's Beta Service Performance Dashboard:

- In looking at the "All Market Dominant" view at the top, there is no context with which to correctly interpret the "FY2020 Mail Product Component Count" circular chart shown on the left. How many products did not meet their target? What volume does that represent, or percent of volume? For the "Composite Scores" shown on the right, it would be helpful to show the actual percentages and as noted above, some explanation of what "composite" scores mean and where to find more detailed information. On the lower part of that section, in the chart that shows the number of "product components" that met or did not meet the USPS service targets and change from prior year, a definition of what "product components" means, and a drill down capability to see a list of what they are (or link to other section that shows that) would be helpful. Also, clarification as to whether the "volume" changes shown represent ALL volume in the category or volume in measurement in the category.
- Within the mail class sections of the dashboard, it would be good in the "hover over" messages on the product components to include more info to explain the #days in the title, e.g., instead of "Single Piece Letters and Postcards (Two-Day)" something like "Single Piece Letters and Postcards with Two-Day service standard." For the "Product Level" data drilldown at the bottom, it would be good to have an explanation of what is included in

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each product component.

- For the Special Services category, more explanation needs to be provided as to exactly what is being measured since “performance” for these product components is not necessarily the # of days to delivery.
- It also would be helpful to have a section of the PRC dashboard show the volume of pieces excluded from service performance measurement by mail class and top 3 reasons (such as the USPS details in quarterly reports to the PRC), as well as trends over time. NAPM and others continue to advocate for mailers to have access to piece level data through Informed Visibility showing which pieces are excluded from measurement and why so that they can take action. Having more visibility into these types of data on mail excluded from measurement will bring more attention to issues around getting more mail into measurement for more accurate service performance reporting.

## **II. Accessibility and Transparency of Other Data**

The PRC in its Order notes that it has “an extensive catalog of public data pertaining to the Postal Service, including information concerning the Postal Service’s service performance, finances, operations, and rates...” The PRC notes that there is a host of data contained within specific PRC filings, with no central place to see it. While the PRC in this section of the order asks for comments related to access of such data by the “general public,” NAPM offers that postal stakeholders such as businesses using the mail, mail service providers, and others that make up the diverse mailing industry are due as much consideration in terms of data access and visibility as members of the

“general public.” The PRC is correct that trying to wade through data contained in hundreds of separate filings is a resource intensive and time consuming task, but that applies to business users of commercial mail as well as single piece consumers. While we can’t speak to what data the general public might like to see more accessible, we can speak to the type of data that business users of the mail would find of value.

- **Volume Trends.** There is data on volume trends contained in the USPS’ quarterly Revenue, Pieces, and Weights (RPW) reports, Billing Determinant Reports, and other filings made as part of the Annual Compliance Determination (ACD), but each report or filing contains data in different formats and for different categories. It would be useful to have a dashboard that looked at volume trends at a minimum at the product “component” level on at least a quarterly basis, but even better would be data at the rate category or grouping level (such as is available in the Billing Determinants report). For example, the ability to see Marketing Mail volume trends by entry point and preparation category, or volume trends for Automation vs NonAutomation mail within a specific product, or volume of IMb Full-Service mail in each mail class, etc. It would also be useful to show actual annual volume trends against USPS’ projected volume trends at the product level.
- **USPS Financial Information.** Another data set that is contained in multiple PRC reports and filings is that of USPS finances. A dashboard that looks at USPS financial projections compared to actual financial performance and trends would be helpful to get a clearer picture of the Postal Service’s financial condition.

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### III. CONCLUSION

NAPM appreciates the work the Commission undertakes in its unique role as regulator of a federal agency, and we applaud the Commission's continued efforts to bring accessibility and transparency of data for all users of the postal system, including business mail users as well as the general public.

NAPM continues to appreciate the efforts by the Commission to improve USPS service performance through increased visibility of performance data, and we appreciate the opportunity to offer suggestions on other data included in PRC filings that would be of value for business mail users to have easier access to. We hope the Commission will consider our constructive comments and recommendations.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Robert Galaher", with a stylized, flowing script.

Robert Galaher  
Executive Director and CEO  
NATIONAL ASSOCIATION OF PRESORT MAILERS  
PO Box 3552  
Annapolis, MD 21403-3552  
(877) 620-6276